

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

<b>In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation</b>	<b>MDL No. 2875 Civil No.: 19-02875 (RBK)</b>
---	---

**NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF ROBERT KRUK**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Princeton Pharmaceutical Inc., Solco Healthcare U.S., LLC, and Huahai U.S., Inc., will take the deposition upon oral examination of Robert Kruk on March 23, 2021, at 9:00 a.m. CST (10:00 a.m. EST) at 8 Mayfair Lane, Aurora, IL 60504.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition is:

Justin M. L. Stern  
Duane Morris LLP  
1875 N.W. Corporate Blvd.  
Suite 300

Boca Raton, FL 33431  
(561) 962-2107  
[jmlstern@duanemorris.com](mailto:jmlstern@duanemorris.com)

Date: February 22, 2021

Respectfully submitted,

s/ Justin M. L. Stern  
Justin M. L. Stern  
Duane Morris LLP  
1875 N.W. Corporate Blvd.  
Suite 300  
Boca Raton, FL 33431  
(561) 962-2107  
[jmlstern@duanemorris.com](mailto:jmlstern@duanemorris.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of February, 2021, a true and correct copy of the foregoing Notice of Videotaped Deposition of Plaintiff Robert Kruk was served upon all counsel of record via CM/ECF.

s/ Justin M. L. Stern  
Justin M. L. Stern